

April 17, 1984

INDUSTRIAL BUSINESS UNIT P.O. Box 3585 736 Federal Street Davenport, Iowa 52808 (319) 326-8111

Iowa Department Of Water, Air & Waste Management Regional Office # 6 117 North Second Avenue Box 27 Washington, Iowa 52353

Attention: Mr. Merritt W. VanLier

Dear Mr. VanLier:

Attached is an outline of the program to bring our facility to compliance and to remove the hazardous waste that is presently stored on the premises. Section III states our plans to operate as a "small generator" in the future utilizing the controls that have already been implemented.

We will, before May 1, file an amended declaration with Mr. Vlieger requesting that our status be changed to that of a small waste generator.

We appreciate the help of your staff in assisting us to get our program back on track.

Sincerely,

chard W. Ericberryay Richard W. Erickson Mfg. Services Mgr.

CC: James R. Lindsay Plant Manager

Encl:



RCRA RECORDS CENTER

## Facility Status

It is Eagle Signal's intent to apply and qualify for small generator status. To achieve this objective, the following action plans have been established.

## I. Storage Area

- 1. Weekly drum inspection established 3/5/84 and being done. Sheet on file.
- 2. Hazardous waste log established and available in Maintenance.
- 3. Drum identification done 4/6/84.

  Identified with accumulation date, waste classification, and identification.
- 4. Containment since waste will be solidified, no containment will be provided.
- Security warning sign installed on fence.
- 6. Ignitables once accumulated waste is disposed of, future accumulation will be stored on the 5th floor. This will resolve the problem of ignitables and the property boundry.

## II. Hazardous Waste Removal

1. We have issued our purchase order 64040072 to E.S.G. Watts to solidify, remove, and dispose of all hazardous wastes presently stored on Eagle Signal property. The removal schedule is as follows:

Purchase new open top drums - on hand Rebarrel and solidify - 4/24-25/84 Removal and disposal - to be determined

2. E.S.G. Watts is working to secure the necessary permits in order to have the material off of our property by 5/1/84. However, as of this date, they have not been able to give absolute assurances that it will happen by the date mentioned. If you have any questions, please contact Mr. Dan Forsyth, E.S.G. Watts, 438 4th Street, Rock Island, Illinois 61201, 309-798-5015, and he will be glad to provide an updated status report.

## III. Operations As Small Generator

Based on an estimated 272 kg/month hazardous waste generation (which is 1.3 barrels a month), a new storage location on the 5th floor of the factory building will be established. This location will be fenced, locked, posted, and have the necessary water and fire fighting equipment. In addition, hazardous waste will be solidified prior to storage for spill control.

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